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LEBOEUF, LAMB, LEIBY & MACRAE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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July 23, 1987

Mr. Richard Dulcey U.S. Environmental Protection Agency, Region III CERCLA Removal Enforcement Section (3HW14) 841 Chestnut Street, 6th Floor Philadelphia, PA 19107

> Tonolli Corporation, Nesquehoning, PA Re:

Dear Mr. Dulcey:

Enclosed are copies of insurance policies which covered Simon-Eastern Corporation from 1979 through 1986. We have also included a table of Simon-Eastern's insurance coverage which lists the date, company and policy type. These policies follow the initial documents which were submitted by Simon-Eastern in response to your request of June 1, 1987. Those initial documents, you may remember, were sent on July 6, 1987 with a letter from Laurie A. Frost of this firm. These follow-up documents have been numbered consecutively to follow the previously submitted documents.

Should you have any questions regarding these policies prior to July 27, 1987 you may contact me. Following that date, Laurie Frost will be back in the office and questions may be directed to her as well.

Austin P. Olney

Attorney for Simon-Eastern Corporation

Enclosures

cc: Ellis Block - Simon-Eastern Corp. Corine B. Rollman